

Samuel D. Brownback
Topeka, Kansas

September 20, 1999

Scott E. Thomas
Chairman
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Dear Chairman Thomas:

I am in receipt of your August 3, 1999 letter from the Commission to me concerning MUR 4736. Since this Factual and Legal Analysis contains the same unsupported, conclusory allegations that I addressed in my previous letter to the Commission, I refer the Commission to my prior submissions in response to MURs 4568, 4633 and 4634.

I am still unclear on what grounds you have found reason to believe against me. As I stated in my previous letter to you in response to MURs 4568, 4633 and 4634, I have no knowledge of Triad, Citizens for Reform and the Citizens for Reform Education Fund, other than what I learned subsequent to the 1996 elections. The Factual and Legal Analysis offers no evidence that either I or my campaign knew of the Triad activities you describe before they occurred.

Moreover, the Factual and Legal Analysis betrays a fundamental misunderstanding of how campaigns operate. Candidates and campaign staff meet as much as possible with potential supporters. Some of these individuals decide to assist the campaign if they support the candidate and his or her positions on the issues. The Factual and Legal Analysis does not present any support for the idea or theory that these types of activities warrant a reason to believe finding against me personally, or my campaign. Yet, the Factual and Legal Analysis colors these alleged activities as improper or illegal without any specific facts or legal authority to support the finding. In addition, with respect to the PAC contributions to my campaign, the statements in my previously submitted affidavit remain uncontroverted other than speculative, unsupported theories by the Commission.

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Since the Commission has not presented any facts or law to controvert my prior submissions in this matter, I object to any finding against me and urge the Commission to dismiss this matter against me.

Sincerely,

A handwritten signature in black ink, appearing to read "Sam Brownback", with a stylized initial "S".

Sam Brownback

Subscribed and sworn to before me this _____ day of September, 1999.

Notary Public

My Commission expires: _____

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SAMUEL D. BROWNBACK

Topeka, Kansas 66610

Att.
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July 7, 1998

**Chairman Joan D. Aikens
Chairman
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463**

Dear Chairman Aikens:

I am in receipt of a June 8, 1998 letter from the Commission to me concerning MURs 4568, 4633 and 4634. I have not received a copy of MURs 4568 and 4633, but I did submit an affidavit concerning MUR 4634 on May 23, 1997. Based on the Factual and Legal Analysis accompanying your June 8 letter, I am unclear on what grounds you have found reason to believe against me.

The 26-page Factual and Legal Analysis is almost entirely about Triad, Citizens for Reform or the Citizens for Reform Education Fund. I have no knowledge of their activities generally, other than what I have learned subsequent to the 1996 elections. Your Factual and Legal Analysis offers to no evidence that either I or my campaign knew of the Triad activities you describe before they occurred.

I am troubled by the Factual and Legal Analysis' statement that "available information suggests" that I may have somehow violated the Act. First of all, the activities I have described constitute my contacts with and knowledge of Triad. I do not believe that under any circumstances this can constitute a violation by me of the Act. Secondly, the "available information" presented by the Factual and Legal Analysis is basically non-existent and conclusory. Yet, the FEC does not hesitate to reach a reason to believe finding against me. I find that without justification.

I never took part in the "political audit" you describe, which apparently was nothing more than a meeting with someone who identified himself as a potential supporter who said his organization wanted to help. I believe it is the job of campaigns and candidates to meet with organizations that are evaluating them to see if they will offer support, but apparently the Federal Election Commission has a different idea. I found no legal authority in your Factual and Legal

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FEDERAL ELECTION COMMISSION

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Chairman Joan D. Aikens
July 7, 1998
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Analysis to support either your idea or a reason to believe finding against me personally (or my campaign).

In terms of Meredith O'Rourke, I do recall her assisting me with making telephone calls on two occasions. She did nothing more than dial numbers for me, on what I believed to be a volunteer basis. I was gratified that she would help me, and appreciated her efforts as I did each of the many people who volunteered their time to assist my campaign. If she was not acting as a volunteer (and the Factual and Legal Analysis presents no facts to the contrary), neither I nor my campaign knew it.

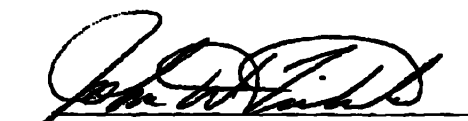
As for the allegations regarding the PAC contributions to my campaign that the FEC alleges were from the Stauffers, I have filed a sworn Affidavit with the Commission. After reviewing your Factual and Legal Analysis, my statements in that Affidavit remain uncontroverted other than a speculative, unsupported theory by the Commission.

Based on what is contained in the Factual and Legal Analysis, I object to any finding against me, and I urge the Commission to dismiss this matter against me.

Sincerely,


Sam Brownback

Subscribed and sworn to before me this 7th day of July, 1998.



Notary Public
NOTARY PUBLIC
DISTRICT OF COLUMBIA
My commission expires:

My Commission Expires
January 31, 1999